

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

STATE OF TEXAS,

Plaintiff,

v.

ALEJANDRO MAYORKAS,
Secretary of Homeland Security, *et al.*,

Defendants.

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Case No. 2:23-CV-00024-AM

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

With Plaintiff's consent, Defendants hereby move for a 30-day extension of time to respond to the Complaint (ECF No. 1). The current deadline to respond to the Complaint is July 25, 2023. If this motion is granted, the deadline to respond to the Complaint will be August 24, 2023. In support of this request, Defendants state as follows:

1. The U.S. Attorney's Office was served on May 26, 2023, making the response to the Complaint due on July 25, 2023. Fed. R. Civ. P. 12(a)(2).
2. Due to the complex and important nature of the issues raised by Plaintiff in its Complaint, and the corresponding need for consultation with and review by multiple federal government agencies to adequately respond to the Complaint, Defendants require additional time to prepare their response.
3. Counsel for the government conferred via telephone with counsel for Plaintiff, Leif A. Olson, who stated that Plaintiff consents to the requested extension.
4. The extension will not prejudice Plaintiff, and there are no other deadlines in the case at this time.

For the foregoing reasons, Defendants respectfully request an extension to August 24, 2023, to respond to the Complaint.

Dated: July 18, 2023

Respectfully submitted,

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